Issue #1 Mandatory VRS: In regards to provifding VRS services 24/7, VRS should be mandatory. With the uprising of technology, many deaf households no longer are burdened with the slow technology of a TTY, which requires a phone line and little use for that phone line. With VRS, high speed internet connection is required, and many Deaf people have dual uses for that high speed connection. Communication and equal accessibility. If Deaf people are given a choice to either pay for a phone line, or pay for high speed connection, they would choose the latter. In the case of an emergency, they might not be able to "call" at 3 or 4 in the morning without the use of VRS. This should definitly be in the morning without the use of VRS. This should definitly be made available 24/7. Issue #2 Pre-conferencing: As a sign language interpreter, any information provided beforehand will help prepare the interpreter. In the event of a conference call, or a deposition through the phone, any information would be vital for seemless interpreting and the information would be correct and the interpreter would be prepared. Interpreters follow the Registry of Interpreters Code of Ethics and any information obtained would promptly be destroyed upon termination of such a call. Issue #3 10 minute rule: Unlike regular TRS (telecommunication relay service), where the transition of one "operator" to another was handled inefficiently and information was lost, Video Interpreters can SEE the caller and do not need the required 10 minutes TRS needs to make a smooth transitional switch. Every intepreter is different and has strengths and weaknesses and in some events one interpreter can possibly understand the consumer more than another interpreter, but if an interpreter is forced to stay on the call for 10 minutes, information could get lost, leaving both the consumer and the interpreter frustrated and unable to process the call to the fullest extent. Forcing an interpreter to stay on a call for 10 minutes is unfair and not equal access since there could be a miscommunication between two parties.

I strongly suggest you overlook all of these issues and take into consideration the feedback from consumers and workers that are exposed to this day in and day out. Have a good day.